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July 31, 2017

VIA FEDERAL EXPRESS

Internal Revenue Service Annex c/o GSA Property Management Office

Attn: Records Custodian 2385 Chamblee Tucker Road Chamblee, GA 30341

Re:

v Omni Elevator Co., Inc. et al.

Fulton County Superior Court Civil Action No. 2016-CV280984

Date of Loss:

10/8/14

Location of Loss:

IRS Annex

Building No. GA0010AE

2385 Chamblee Tucker Road, Chamblee, GA 30341

Our Ref:

2927-54668

Dear Sir/Madam:

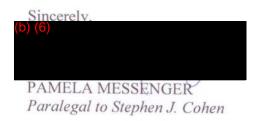
Please be advised that our firm represents the Defendant, Omni Elevator Co., Inc., in a lawsuit filed in the Superior Court of Fulton County. In order to effectively represent our client, it is necessary to examine certain records regarding the plaintiff, incident which occurred on (b) (4) alleged inside the IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, Georgia 30341.

Enclosed is a Request for Production of Documents necessitated by litigation involving the above-referenced plaintiff. These requests are authorized by O.C.G.A. § 9-11-34 which permits a party to secure relevant documents from persons, firms or corporations who are not parties to the lawsuit.

The documents that are being requested are specifically enumerated on the Request for Production of Documents. Unless otherwise stated thereon, the entire file, including billing, is to be produced without any omissions whatsoever, which relate the plaintiff, (b) (6) alleged incident which occurred on (b) (4) inside the IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, Georgia 30341.

We will promptly pay your reasonable copying costs upon receipt of the documents, including the enclosed fully-executed Declaration and your statement. If you prefer payment in advance, please notify me of the amount of the copying costs and we will send you our firm's check. Please do not prepare any special reports, summaries or transcriptions, other than those which are already contained in the records.

Should you have any questions, please feel free to call me at your convenience. If not, we look forward to receiving your response within the time required by law.



Enclosures

cc: R

Reginald A. Greene, Esq. and Jenaye M. Lawrence, Esq. Kevin A. Doyle, Esq. and Yamisi James, Esq. Adrian Britt, Esq.

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

EDWARD COOK,	
Plaintiff,	
v.)	Civil Action File No. 2016CV280984
SCHINDLER ELEVATOR)	20100 1200701
CORPORATION, BROOKS RANGE) CONTRACT SERVICES, and OMNI)	
ELEVATOR CO., INC.	
Defendants.	

REQUEST FOR PRODUCTION OF DOCUMENTS TO A NON-PARTY

TO: Internal Revenue Service Annex c/o GSA Property Management Office Attn: Records Custodian 2385 Chamblee Tucker Road

Chamblee, GA 30341

Within thirty (30) days after service hereof you are hereby requested, pursuant to O.C.G.A. § 9-11-34-(c), to produce for inspection and copying at the office of Carlock, Copeland & Stair, LLP, 191 Peachtree Street, N.E., Suite 3600, Atlanta, Georgia 30303, the following described documents:

(a) Any and all incident reports, memorandum, photographs, witness statements, or documents of any kind concerning Edward Cook's alleged incident on October 8, 2014 at the IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, GA 30341.

Pursuant to O.C.G.A. § 24-8-803(6) and 24-9-902(11), all parties are hereby notified of the undersigned's intention to offer records produced in response to this Request into evidence at the trial of this case. Such records and declaration shall be made available to all parties for inspection upon request.

In lieu of producing for inspection and copying, you may send photocopies of such documents to the address stated below, and the reasonable cost of reproduction will be paid by the Defendant.

This 31st day of July, 2017.

191 Peachtree Street, N.E. Suite 3600 Atlanta, Georgia 30303 Phone: (404) 522-8220

Fax: (404) 523-2345

glovell@carlockcopeland.com sjcohen@carlockcopeland.com CARLOCK, COPELAND & STAIR, LLE

By:

D. GARY LOVELL, JR. Georgia Bar No. 459389 STEPHEN J. COHEN Georgia Bar No. 556599

Attorneys for Defendant, Omni Elevator, Co., Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter by depositing a true copy of same in the U. S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Reginald A. Greene, Esq. Greene Legal Group, LLC One Georgia Center, Suite 605 600 West Peachtree Street, NW Atlanta, GA 30308 Jenaye M. Lawrence, Esq. P.O. Box 764 Fairburn, GA 30213

Kevin A. Doyle, Esq. Yamisi James, Esq. Lockey, Mobley and Doyle, LLP 8425 Dunwoody Place Atlanta, GA 30350

Adrian Britt, Esq.
Dodson & Associates
Caller Service No. 1808
1000 Winward Concourse, Suite 210
Alpharetta, GA 30005

This 31st day of July, 2017.

CARLOCK, COPELAND & STATE, LLP
(b) (6)

By:

STEPHEN J. COHEN Georgia Bar No. 556599

Attorneys for Defendant, Omni Elevator, Co., Inc.

191 Peachtree Street, N.E. Suite 3600 Atlanta, Georgia 30303 Phone: (404) 522-8220 Fax: (404) 523-2345

sjcohen@carlockcopeland.com

DECLARATION OF AUTHENTICITY PURSUANT TO O.C.G.A. § 24-9-902(11)

THE UNDERSIGNED,	, declares that he/she
	on responsible for the keeping of records for GSA
	within and attached records are true and accurate
	which were kept in the offices of GSA PROPERTY
	were kept as reasonably necessary. Pursuant to
	GNED declares that the within and attached records:
	of the occurrence of the matter set forth by, or
	y, a person with knowledge of such matters;
(B) Were kept in the course of the	
	nducted activity as a regular practice.
	n in lieu of the personal appearance of THE
	a case or proceeding entitled Edward Cook v. Omni
	No. 2016CV280984, in the Superior Court of Fulton
	SIGNED further declares that said records with this
	nela Messenger, Carlock Copeland & Stair, LLP, 191
	60303, Paralegal to Stephen J. Cohen, attorney for the
	ight production, pursuant to O.C.G.A. § 9-11-34.
Sworn to and subscribed before me thisday of, 2017.	Records Custodian for: GSA Property Management
Notary Public My Commission Expires: (AFFIX NO	ΓARIAL SEAL)